

NICHOLAS A. TRUTANICH
United States Attorney
NICHOLAS D. DICKINSON
Assistant United States Attorney
United States Attorney's Office
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
Tel: (702) 388-6175
Fax: (702) 388-6787
Nicholas.Dickinson@usdoj.gov

TIMOTHY FINLEY
DANIEL ZYTNIK
Trial Attorneys
U.S. Department of Justice
Consumer Protection Branch
PO Box 386
Washington, DC 20044
Tel: (202) 307-0050, (202) 598-8337
Fax: (202) 514-8742
Timothy.T.Finley@usdoj.gov
Daniel.E.Zytnick@usdoj.gov

Attorneys for Plaintiff
United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARIO CASTRO,
JOSE SALUD CASTRO,
SALVADOR CASTRO,
MIGUEL CASTRO
JOSE LUIS MENDEZ, AND
ANDREA BURROW,

Defendants.

Case No.: 2:19-cr-00295-GMN-NJK

PROTECTIVE ORDER

The United States, by and through its counsel of record, and defendants Mario Castro, Jose Salud Castro, Salvador Castro, Miguel Castro, Jose Luis Mendez, and Andrea Burrow, by and through their undersigned counsel (collectively, hereinafter “the parties”), respectfully move for entry of a Protective Order governing discovery provided to the defendants in this matter in accord with the following Stipulation.

STIPULATION

Whereas, the parties recognize that various federal and state laws and regulations extend protections and limitations regarding the use, disclosure or publication of information associated with the privacy and identity of an individual, including, but not limited to, social security number, date of birth, address, telephone number, driver's license number, financial information, banking information, and tax information, which is hereinafter collectively referred to as "Protected Personal Information" ("PPI").

Whereas, the parties recognize that discovery in the above-captioned case is likely to be voluminous and may include documents and other evidence containing PPI or that are otherwise sensitive.

Whereas, the parties desire to provide for the timely and expeditious exchange of discovery while simultaneously guarding against the inappropriate use, disclosure, or publication of any PPI associated with any party or third party or any other sensitive information.

1 Whereas, in light of the above, the parties have conferred on this matter and
2 have reached agreement on the exchange and handling of materials provided in
3 discovery.

4 **IT IS HEREBY STIPULATED AND AGREED** by and between the
5 undersigned parties, as follows:

6 1. All materials provided as discovery by the government, including, but
7 not limited to, recordings, investigators' or agency reports, witness statements,
8 memoranda of interviews, computer hard drives and other electronic media, and
9 any other documents provided by the government other than trial exhibits (*i.e.*,
10 items actually admitted during the trial and made part of the record), in
11 preparation for or in connection with any stage of the proceedings in this case,
12 including pre-indictment, shall be referred to as "Discovery Materials."

13 2. The government may produce Discovery Materials to the defendants
14 without redacting PPI.

15 3. Unless otherwise authorized by the Court, access to Discovery
16 Materials produced by the government will be restricted to the defendants,
17 attorneys for the defendants, and any agents, contractors, or employees acting on
18 behalf of the defendants and/or their attorneys in connection with the above-
19 captioned matter (hereinafter referred to collectively as "Authorized Person(s)").

20 4. Attorneys for the defendants will ensure that all Authorized Persons
21 receive a copy of this Stipulation and are familiar with its terms and conditions.
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1 5. Except when carrying out duties or when acting on behalf of the
2 defendants and/or their attorneys in connection with the above-captioned matter,
3 an Authorized Person shall not, without leave of Court:

- 4 a. grant or permit access to Discovery Materials by any non-
5 Authorized Person.
- 6 b. allow or permit any non-Authorized Person to read, review, or
7 reproduce any Discovery Materials.
- 8 c. distribute any Discovery Materials, by any means, to any non-
9 Authorized Person.
- 10 d. use or disclose Discovery Materials for any purpose other than
11 in connection with the defense of the above-captioned matter.
- 12 e. use or disclose Discovery Materials in connection with any
13 pleadings or proceedings in the above-captioned matter without
14 first redacting any PPI, unless the PPI is directly relevant to
15 the matter at issue.
- 16 f. use or disclose PPI in connection with any pleadings or
17 proceedings in the above-captioned matter unless the PPI is
18 directly relevant to the matter at issue.
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20 6. An Authorized Person shall not, without leave of Court, permit any
21 non-Authorized Person to retain any copies of Discovery Materials. Unless
22 otherwise authorized by the Court, upon conclusion of the above-captioned matter,
23 the defendant's attorney shall return any and all copies of Discovery Materials to
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1 the attorneys for the United States, or provide them with written certification that
2 the Discovery Materials have been destroyed.

3 7. Nothing in the agreement shall be deemed an admission of the
4 evidentiary or admissibility or inadmissibility of any of the Discovery Materials in
5 any subsequent proceeding.

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WHEREFORE, the undersigned respectfully request that the Court accept and enter this Stipulation as the Protective Order governing discovery in this case.

Respectfully submitted,

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Timothy Finley
TIMOTHY FINLEY
DANIEL ZYTNIACK
Trial Attorneys
U.S. Department of Justice
Consumer Protection Branch
PO Box 386
Washington, DC 20044
Tel: (202) 307-0050, (202) 598-8337
Fax: (202) 514-8742
Timothy.T.Finley@usdoj.gov
Daniel.E.Zytnick@usdoj.gov

December 18, 2019
Date

/s/ Erick M. Ferran
ERICK M. FERRAN
Counsel for Defendant
MARIO CASTRO

December 18, 2019
Date

/s/ Osvaldo E. Fumo
OSVALDO E. FUMO
Counsel for Defendant
JOSE SALUD CASTRO

December 18, 2019
Date

/s/ Donald J. Green
DONALD J. GREEN
Counsel for Defendant
SALVADOR CASTRO

December 18, 2019
Date

/s/ Yi Lin Zheng
YI LIN ZHENG
Counsel for Defendant
MIGUEL CASTRO

December 18, 2019
Date

1 /s/ Telia U. Williams
2 TELIA U. WILLIAMS
3 Counsel for Defendant
JOSE LUIS MENDEZ

December 18, 2019
Date

4 /s/ Crane M. Pomerantz
5 CRANE M. POMERANTZ
6 Counsel for Defendant
ANDREA BURROW

December 18, 2019
Date

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8 **IT IS ORDERED**

9 This 26th day of December, 2019.

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12 _____
NANCY J. KOPPE
13 UNITED STATES MAGISTRATE JUDGE
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